

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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U.S. DISTRICT COURT  
SOUTHERN DIST. OHIO  
EAST. DIV. COLUMBUS

UNITED STATES OF AMERICA

VS.

:

CASE NO.  
JUDGE

SHANE M. MAUGER

2:16-cr-091

GOVERNMENT'S PLEA AGREEMENT SUBMISSION  
OF ELEMENTS AND PENALTIES FOR  
18 U.S.C. § 241 AND 18 U.S.C. § 666(a)(1)(A)

Judge Marbley

COUNT 1

1. ELEMENTS: 18 U.S.C. § 241

- First: That the defendant knowingly agreed with another person to injure or oppress one or more third parties in the exercise of a right guaranteed by the Constitution of the United States;
- Second: That the defendant specifically intended to interfere with the federal right in question; and
- Third: That the agreement or at least one act of the conspiracy took place in the Southern District of Ohio.

2. PENALTIES

- A. Mandatory Minimum: None.
- B. Possible Maximum: 10 years' imprisonment, a fine of \$250,000, 3 years supervised release, and \$100 special assessment.

COUNT 2

3. ELEMENTS: 18 U.S.C. § 666(a)(1)(A)

- First: That, at the times alleged in the Information, the defendant was an agent of an agency of a local government —namely, the Reynoldsburg Division of Police;
- Second: That, in a one-year period, the Reynoldsburg Division of Police and the City of Reynoldsburg each received federal benefits in excess of \$10,000;

- Third: That the defendant stole property, obtained property by fraud, or without authority knowingly converted property to the use of a person other than its rightful owner;
- Fourth: That the property stolen, obtained by fraud, or knowingly converted was in the care, custody, or control of the Reynoldsburg Division of Police;
- Fifth: That the value of the property stolen, obtained by fraud, or knowingly converted was at least \$5,000; and
- Sixth: That an essential element of the offense occurred in the Southern District of Ohio.

4. PENALTIES

- A. Mandatory Minimum: None.
- B. Possible Maximum: 10 years' imprisonment, a fine of \$250,000, 3 years supervised release, and \$100 special assessment.

Respectfully submitted,

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